#### Title V

#### **Model General Permit Template**

#### **SERIES 14 Tanks**

#### Template # SJV-TK-14-0

external floating roof tank

tank not used at drilling and production facility prior to custody transfer

storage capacity greater than 40,000 gallons but not exceeding 65,000 gallons and construction, modification, or reconstruction commenced between March 8, 1974 and May 19, 1978

storage capacity greater than 65,000 gallons and construction, modification or reconstruction commenced between

June 11, 1973 and May 19, 1978

exempt from requirements of District Rule 4623, Sections 5.1, 5.2, and 5.3

true vapor pressure greater than 1.5 psia and less than 11 psia

This template is designed to streamline the Title V permitting process for tanks meeting the above qualifications. Applicants for Title V permits choosing to use this template will only have to complete the enclosed template qualification form and submit it with their Title V application.

## **San Joaquin Valley Unified Air Pollution Control District**

# Final Title V Model General Permit Template Series 14 Tanks

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## SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT

#### **TITLE V GENERAL PERMIT TEMPLATE SJV-TK-14-0**

#### **ENGINEERING EVALUATION**

#### **TABLE OF CONTENTS**

## SECTION PAGE

I. PURPOSE		1
II. TEMPLATE APPLICABILITY		1
III. APPLICABLE REQUIREMENTS		1
IV. COMPLIANCE		3
V. PERMIT SHIELD		3
VI. PERMIT CONDITIONS		5
APPENDIX AEPA Comments / District Response	A-1	
APPENDIX B463.2 SIP District Rule / District Rule 4623	B-1	
APPENDIX CTemplate Qualification Form	TQF-1	

#### I. Purpose

The purpose of the proposed template is to streamline the Title V permitting process and reduce the time required by the applicant and the District by identifying the federally applicable requirements for tanks and establishing permit conditions which will ensure compliance with such requirements. These conditions will be incorporated into the Title V permit of any facility choosing to make use of the template.

#### II. Template Applicability

The template applies to any tank which:

Has an external floating roof, and

Has a storage capacity greater than 40,000 gallons but not exceeding 65,000 gallons, and construction, modification, or reconstruction commenced between March8, 1974 and May 19, 1978, or

Has a storage capacity greater than 65,000 gallons, and construction, modification, or reconstruction commenced between June 11, 1973 and May 19, 1978, and

Has a true vapor pressure greater than 1.5 psia and less than 11.1 psia.

The applicability of this template is determined by completion of the Template Qualification Form (TQF) attached as Appendix C. The completed and signed TQF for each qualifying unit must be submitted with the Title V application.

### III. Applicable Requirements

Units may be subject to "federally enforceable" requirements as well as requirements that are enforceable by the "District-only". Federally enforceable requirements will be enforceable by the EPA, the District, and the public through Title V permit conditions identified as federally enforceable. District-only requirements represent local or state regulations for which the EPA has no direct enforcement authority. The final Title V permits issued by the District will contain both federally enforceable and District-only requirements.

District-only requirements are not addressed in this template except for those used in streamlining of multiple requirements. District-only requirements used in streamlining of multiple requirements will become federally enforceable. Table 1, Applicable Requirements, does not necessarily include all federally enforceable requirements that apply to tanks qualifying to use this template, and it is the source's responsibility to determine any and all applicable requirements to which the source is subject. Generally, requirements not addressed by this template are those that require a source-specific analysis, or are covered by other templates.

**Table 1 Applicable Requirements** 

Rule Category	Rule/Regulation	Citation	Description
A	NSPS Subpart K	40CFR60 60.110	Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978
А	SJVUAPCD Reg. IV	4623 except Section 5.1, 5.2, & 5.3	Storage of Organic Liquids
Α	SJVUAPCD Reg. II	2520, 9.5.2	Federally Mandated Operating Permits
В	SJVUAPCD Reg. II	2201	New Source Review Rule
В	SJVUAPCD Reg. II	2520	Federally Mandated Operating Permits
В	SJVUAPCD Reg. IV	4101	Visible Emissions
В	NESHAP, Subpart CC	40CFR63	Petroleum Refineries
В	NESHAP, Subpart F	40CFR63	Synthetic Organic Chemical Manufacturing Industry
В	NESHAP, Subpart I	40CFR63	Certain Processes Subject to the Negotiated Regulation for Equipment Leaks
С	SJVUAPCD Reg. IV	4623, 5.1, 5.2, & 5.3	Storage of Organic Liquids
С	SJVUAPCD Reg. IV	4661	Organic Solvents
С	SJVUAPCD Reg. IV	4801	Sulfur Compounds
С	NSPS Subpart Ka	40CFR60 60.110a	Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984
С	NSPS Subpart Kb	40CFR60 60.110b	Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification commenced after July 23, 1984

Category "A" rules contain requirements that are directly applicable to the qualifying units; compliance with these applicable requirements will be demonstrated in this engineering evaluation and assured by the template permit conditions. In section IV, <u>Compliance</u>, the federally-enforceable requirements from category "A" rules are listed with a discussion of how compliance with these requirements is achieved.

Category "B" rules contain federally enforceable requirements that were not addressed in this template. These may not be all of the federally enforceable requirements for this unit. Requirements from these rules must be addressed by the applicant outside of this template within the Title V application Compliance Plan form (TVFORM-004). Category "B" listing is included in this table as an informational item to assist applicants in this effort.

Category "C" rules contain requirements which have been determined not to be applicable to qualifying units. A permit shield is proposed for the category "C" rules. An explanation of the determination of non-applicability of category "C" rules is included in the permit shield section of this evaluation.

#### **IV.** Compliance

This section contains a discussion of how compliance is assured with each requirement addressed in this template.

#### 40CFR60, Subpart K

This section requires that any storage vessel in the storage capacity and true vapor pressure range covered by this template be equipped with either a floating roof, a vapor recovery system, or its equivalent. Tanks covered by this template are required to be equipped with an external floating roof meeting the specifications of 40CFR60, Subpart K. Template permit conditions will be added to require that tanks covered by this template are equipped with an external floating roof and proper closure seals. Template permit conditions will also be added for associated monitoring and recordkeeping requirements. See template permit conditions #1-7, and #11.

#### District Rule 4623

District Rule 4623 has been submitted to the EPA to replace the old District Rule 463.2 which is SIP approved. Appendix B lists all of the applicable requirements of District Rule 4623 and shows which are included in the rule from the old SIP approved rule. This table shows that District Rule 4623 is as stringent as rule 463.2, thus rule 463.2 will subsumed by rule 4623 for the purposes of this template.

Section 2.0 states that this rule is only applicable to equipment used to store organic liquids, including crude oil and petroleum distillates, with a true vapor pressure of greater than 1.5 psia.

Section 4.2.1 requires fixed roof tanks designated for emergency standby be equipped with a pressure relief device set to within 10 percent of the maximum allowable working pressure of the container. This section also lists other

requirements regarding emergency standby status and use. See template permit condition #8.

Section 6.0 requires periodic monitoring, testing and recordkeeping of tanks covered by this template. Periodic monitoring, such as maintaining a record of the liquid stored, the storage temperature, the Reid vapor pressure of that liquid during the respective storage period, and associated testing will be required. See template permit conditions #4, #5, #7, and #9.

#### District Rule 2520, 9.5.2

Section 9.5.2 requires all records be maintained for at least five years. Template permit condition #10 requires that all records be maintained for at least five years.

#### V. Permit Shield

A permit shield legally protects a facility from enforcement of the shielded regulations when a source is in compliance with the terms and conditions of the Title V permit. Compliance with the terms and conditions of the Title V permit is considered compliance with all applicable requirements upon which those conditions are based. A permit shield is requested in template permit condition #11.

A permit shield will also be granted for 40CFR60 Subpart Ka and Kb because facilities qualifying to use this template commenced construction, modification, or reconstruction before May 19, 1978. These rules only apply to units that commence construction, modification, or reconstruction after May 19,1978. A permit shield is granted from these requirements in template permit condition #12.

A permit shield will also be granted for District Rule 4623, Section 5.0. Units qualifying to use this template must be the following:

1. Floating roof tanks designed for emergency standby, storage not exceeding 30 days at a time, in existence prior to May 1, 1979, which store exclusively petroleum distillates or crude oil.

Tanks in this category are exempt from District Rule 4623, Sections 5.1, 5.2 and 5.3. Tanks with a storage capacity greater than 19,800 gallons are exempt from Section 5.4. Tanks qualifying to use this template must have storage capacity greater than 40,000 gallons. Therefore, Section 5.0 (Requirements) of District Rule 4623 does not apply to units covered by this template. A permit shield is granted from this requirement in template permit condition #13.

A permit shield will also be granted for District Rule 4661. The provisions of this rule are limited to organic solvents. Organic solvents are defined in this rule as organic materials which are liquids at standard conditions and which are used as

dissolvers, viscosity reducers or cleaning agents. Tanks storing these liquids are excluded from this template in the template qualification form (see Appendix C). Therefore, this rule does not apply to units covered by this template. A permit shield is granted from this requirement in template permit condition #13.

A permit shield will also be granted for District Rule 4801. This rule specifies testing requirements for a stack source. Tank emissions are fugitive emissions not considered to come from a point source. Therefore, this rule does not apply to units covered by this template. A permit shield is granted from this requirement in template permit condition #13.

#### **VI.** Permit Conditions

The following conditions will be incorporated into the Title V permit of any facility choosing to make use of template #SJV-TK-14-0:

- 1. True vapor pressure of the liquid stored shall not exceed 11 psia [40CFR 60.112]
- 2. Storage vessel shall be equipped with a cover consisting of either a double deck or pontoon single deck, which rests upon and is supported by the petroleum liquid being contained. [40CFR 60.112(a)(1)]
- 3. Floating roof shall be equipped with a closure seal or seals to close the space between the roof edge and tank wall. [40CFR 60.112(a)(1)]
- 4. Operator shall keep a record of liquids stored in each container, period of storage, storage temperature, maximum true vapor pressure, and the Reid vapor pressure of such liquids. [40CFR 60.113(a) and District Rule 4623, 6.1]
- 5. Maximum true vapor pressure may be determined from nomographs contained in API Bulletin 2517, by using the typical Reid vapor pressure and the maximum expected storage temperature of the stored product, unless the APCO specifically requests that the liquid be sampled, the actual storage temperature determined, and the Reid vapor pressure determined from the sample(s). [40CFR 60.113(b)]
- 6. Operator shall determine the true vapor pressure of each type of crude oil with a Reid vapor pressure less than 2.0 psia or whose physical properties preclude determination by the recommended method from available data and record if the true vapor pressure is greater than 1.0 psia. [40CFR 60.113(c)]
- 7. True vapor pressure shall be measured using Reid vapor pressure ASTM Method D323-82 modified by maintaining the hot water bath at storage

temperature. Where storage temperature is above 100 °F true vapor pressure shall be determined by Reid vapor pressure at 100 °F and ARB approved calculations, except as allowed otherwise by this permit. [District Rule 4623, 6.2.2]

- 8. For any tank designated for emergency standby, in existence prior to May 1, 1979, and which stores exclusively petroleum distillate or crude oil, the following shall apply: 1) Each use of the tank shall not exceed 30 days and, prior to returning the tank to emergency status, the tank shall be thoroughly drained; and 2) After a tank has been used (filled or partially filled) and draining of the tank has begun, any further filling of the tank shall constitute a separate use of the tank. [District Rule 4623, 4.2.1]
- 9. If the unit is an emergency standby tank in existence prior to May 1, 1979, and which stores exclusively petroleum distillate or crude oil, operator shall record liquids stored in each container, storage temperature, Reid vapor pressure of liquids, the date(s) liquid is first introduced into the tank, and date(s) tank is fully drained. Such records shall be submitted to the APCO 60 days prior to permit renewal. [District Rule 4623, 6.1.2]
- 10. The operator of a storage vessel with an external floating roof shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.5.2]
- 11. Compliance with permit conditions in the Title V permit shall be deemed compliance with 40CFR60 Subpart K and SJVUAPCD Rule 4623 (Amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2]
- 12. The requirements of 40CFR60 Subpart Ka and Kb do not apply to this source. A permit shield is granted from these requirements. [District Rule 2520, 13.2]
- 13. The requirements of SJVUAPCD Rule 4661 (Amended December 17, 1992) and 4801 (Amended December 17, 1992), and 4623, Section 5.0 (Amended December 17, 1992) do not apply to this source. A permit shield is granted from these requirements. [District Rule 2520, 13.2]

## APPENDIX A

## EPA COMMMENTS / DISTRICT RESPONCE FOR TEMPLATE # SJV-TK-14-0

#### **EPA COMMENTS / DISTRICT RESPONSE**

The EPA's comments regarding tank templates are encapsulated below followed by the District's response. A copy of the EPA's 12/3/96 letter is available at the District.

#### A. General Comments

#### 1. EPA COMMENT

In all of the templates, the first paragraph should be revised to clarify that federally enforceable requirements in Title V permits will be enforceable not only by EPA and the public, but by the District as well.

#### DISTRICT RESPONSE

The first paragraph of the templates will be reworded as follows:

Units may be subject to "federally enforceable" requirements as well as requirements that are enforceable by the "District-only." Federally enforceable requirements will be enforceable by the EPA, the District, and the public through Title V permit conditions identified as federally enforceable. District-only requirements represent local or state regulations for which the EPA has no direct enforcement authority. The final Title V permits issued by the District will contain both federally enforceable and District-only requirements.

#### 2. EPA COMMENT

In template Series 1 to 10, the second paragraph of the applicable requirements should be revised so as to be consistent with the language in the other templates.

#### DISTRICT RESPONSE

The second paragraph of these series will be revised to read as follows:

"District-only requirements are not addressed in this template except for those used in streamlining of multiple requirements. District-only requirements used in streamlining of multiple requirements will become federally enforceable. Table 1, Applicable Requirements, does not necessarily include all federally enforceable requirements that apply to tanks qualifying to use this template, and it is the source's responsibility to determine any and all applicable requirements to which the source is subject. Generally, requirements not addressed by this template are those that require a source-specific analysis, or are covered by other templates".

#### 3. EPA COMMENT

Rule 4623 is the renumbered version of District Rule 463.2, which is the SIP-approved version of the rule. Permit conditions must be referenced to this SIP rule. In the analysis section of the template, the District may wish to explain that Rule 463.2 is the equivalent SIP-approved version of Rule 4623.

#### **DISTRICT RESPONSE**

The District will append a table to each template showing the rule numbers of the county SIP rules corresponding to the current District rules, and the permit conditions which show compliance with the provisions of those SIP rules. Also, in the compliance sections, it will be stated that Rule 4623 is a renumbering of the county SIP rules with no changes in requirements from those rules.

#### 4. EPA COMMENT

The suggestion is made to include the various MACT standards that contain provisions for storage vessels in the list of Category "B" rules.

#### **DISTRICT RESPONSE**

Applicable MACT standards will be included in the list of Category "B" rules in current templates.

#### 5. EPA COMMENT

Include the adoption date of rules included in the permit shield.

#### DISTRICT RESPONSE

Adoption dates of rules referenced in the templates will be included in the permit shields.

#### 6. EPA COMMENT

Any sections of applicable requirements not addressed in the templates must be excluded from the permit shields.

#### DISTRICT RESPONSE

Affected sections will be excluded from the permit shields of these and all future templates.

#### 7. EPA COMMENT

A general condition should be included in the permit conditions that states the definitions in the rules cited as the origin and authority for each permit condition.

#### DISTRICT RESPONSE

The District feels that the definitions in the rules are sufficient, as they were considered in previously approved templates. However, a condition will be added

to the umbrella template (SJV-UM-0-0) stating that all terms are used as defined in the cited underlying requirement unless otherwise explicitly defined within a particular permit condition.

#### 8. EPA COMMENT

Either the templates or the Title V permit must include a requirement that reports of required monitoring be submitted at least every 6 months.

#### DISTRICT RESPONSE

Section 9.6.1 of District Rule 2520, as approved by EPA on 5/24/96, requires submittal of reports of any required monitoring at least every 6 months *unless a different frequency is required by an applicable requirement* (emphasis added). SJV-UM-0-0, the facility-wide template, includes a permit condition stating this requirement. Sources not using the facility-wide template will have this condition imposed in the Title V permit.

#### 9. EPA COMMENT

The cite for the origin and authority of each permit condition should be specific to the provision (i.e. subsection) of the rule so it is clear what portion of the applicable requirement is being addressed.

#### DISTRICT RESPONSE

Cites have been revised to include applicable subsections of requirements.

#### 10. EPA COMMENT

The Template Qualification Forms (TQFs) for all tank templates ranging from Series 4 through Series 18 should include a question asking whether the tank is equipped with a pressure relief valve, as required by SIP Rule 463.2, and disallowing those units not so equipped from using the template.

#### **DISTRICT RESPONSE**

The qualifier referenced above will be changed to read as follows:

"Is this a tank with a capacity of 84,000 gallons or less of a small producer (as defined in District Rule 4623) with a daily throughput of less than 6,300 gallons per day, and equipped with a pressure relief device set to within 10 percent of the maximum working pressure of the tank? If "no", continue to next question; otherwise STOP - you cannot use this template".

#### 11. EPA COMMENT

The compliance certification language must include the following language to be consistent with be consistent with part 70 requirements:

"Based on information and belief formed after reasonable inquiry 1) the information on this form is true, accurate, and complete and 2) the facility is in compliance with this template's permit conditions."

#### DISTRICT RESPONSE

The templates will be submitted as part of a complete Title V application. The Title V application contains a Compliance Certification Form (TVFORM-005 in the SJVUAPCD Title V Permit Application Package). On the Compliance Certification Form the responsible official certifies the truth, accuracy, and completeness of the Title V application, including all supporting information.

#### 12. EPA COMMENT

The TQF should provide information on the origin and authority of the qualification terms.

#### **DISTRICT RESPONSE**

Citations have been be added where missing or expanded as required.

#### 13. EPA COMMENT

The District must be consistent with the underlying requirement when referring to capacity thresholds in the TQF.

#### DISTRICT RESPONSE

Such references have been reviewed and revised where necessary to achieve consistency with the language in the underlying requirement.

#### Series 14 Tanks

#### **Permit Conditions**

#### 1. EPA COMMENT

pursuant to section 60.113(a), in addition to the records required by condition 4, the template must also require the operator to keep a record of the maximum true vapor pressure of each liquid stored in each container.

#### **DISTRICT RESPONSE**

The permit conditions discussed in the above comment has been modified to the following:

Operator shall keep a record of liquids stored in each container, period of storage, storage temperature, maximum true vapor pressure, and the Reid vapor pressure of such liquids.

#### 2. EPA COMMENT

While Rule 463.2, section V.A.3 requires small producer to submit records of average daily throughput to the APCO 30 days prior to permit renewal, this requirement (condition 11) could be streamlined with the general requirement of Rule 2520 that sources submit reports of all required monitoring to the APCO at least every six months.

#### DISTRICT RESPONSE

District Rule 2520, 9.6.1 requires "submittal of reports of any required monitoring at least every six months *unless a different frequency is required by an applicable requirement* (emphasis added)". In this case there is no advantage to streamlining, therefore no streamlining will be done and the condition will remain unchanged.

#### 3. EPA COMMENT

Condition 5 should state "unless the APCO or Administrator specifically requests..."

#### **DISTRICT RESPONSE**

The District was given authority to implement and enforce Subpart Ka, the origin and authority for this condition, in a letter dated June 22, 1993 from EPA to Michael Scheible of the California Air Resources Board. There is no provision in this subpart prohibiting EPA from delegating to the states any authority therein. Therefore the District feels that it has the authority to act as the Administrator. Consequently the condition will not be changed.

## **APPENDIX B**

# 463.2 SIP DISTRICT RULE / 4623 DISTRICT RULE COMPARISON FOR TEMPLATE # SJV-TK-14-0

	4623 SJVUAPCD	463.2 old SIP Rule
EXEMPTIIONS		
The requirements of this rule shall not apply to; For any tank designated for emergency standby, in existence prior to May 1, 1979, and which stores exclusively petroleum distillate or crude oil. Prior to return to emergency standby status, each tank shall be thoroughly drained. Each use of the tank shall not exceed 30 days. After a tank has been used (filled or partially filled) and draining of the tank has begun, any further filling of the tank shall constitute a separate use of the tank. The tank shall be equipped with a pressure relief device set to within ten (10) percent of the maximum allowable working pressure of the tank.	X	X
If the unit is a tank with a capacity of less than 84,000 gallons or less of a small producer with a daily throughput of less than 6,300 gallons per day, and equipped with a pressure relief device set to within 10 percent of the maximum allowable working pressure of the tank.  Temporary tanks, with capacities of 21,000 gallons or less, left on site	X	Х
for six months or less.	V	V
Tanks, reservoirs or other containers which are pressure vessels maintaining	Χ	X
working pressures sufficient at all times to prevent organic liquid loss or VOC loss to the atmosphere.	X	Х
If a new incineration device is required solely to comply with the requirements of this rule for existing tanks such device shall not be subject to the requirements of the New and Modified Stationary Source Review Rule provided the device includes BACT provisions for all air contaminants and the device is under District permit.	X	Х
REQUIREMENTS		
Liquid stored has a TVP of 11 psia or greater under storage conditions	Χ	Х
No person shall place, store or hold in any floating roof tank of 19,800 gallons or greater, any organic liquid unless such tank, is equipped with; 1) a floating roof consisting o a pontoon-type or double-deck-type cover, 2) a closure device between the tank shell and roof edge consisting of two seals.	X	X
Seal designs shall be submitted to the APCO and shall not be installed or used unless they are approved by the APCO as meeting the criteria set forth in the following.	Х	X
Metallic-shoe-type, welded tanks;  No gap between the tank and primary seal shall not exceed 1 1/2 inches. The cumulative length of all gaps greater than 1/2 inch shall not exceed 10% of the circumference of the tank. The cumulative length of all primary seal gaps greater than 1/8 inch shall not exceed 30% of tank circumference. No continuous gap greater than 1/8 inch shall exceed 10% of the tank circumference.	X	X
No gap in the secondary seal shall exceed 1/2 inch. The cumulative length of all gaps greater than 1/8 inch shall not exceed 5% of the tank circumference.	X	Х

If the primary seal is a metallic shoe, one end of the metallic shoe is to extend into the stored liquid and the other end is to extend a minimum vertical distance of 24 inches above the stored liquid surface.	Х	Х
If the primary seal is a metallic-shoe-type seal, then the geometry of the shoe shall be such that the maximum gap between the shoe and the tank shell is no greater than double the gap allowed by the seal gap criteria for a length of at least eighteen inches in the vertical plane above the liquid surface.	X	Х
The secondary seal shall allow easy insertion of probes up to one and one-half (1-1/2) inches in width in order to measure gaps in the primary seal.	Х	Х
Secondary seal shall extend from the roof of the tank to the shell and not be attached to the primary seal.	Х	х
Metallic-shoe-type seal, riveted tank; No gap between the tank and primary seal shall not exceed 2 1/2 inches. The cumulative length of all gaps greater than1 1/2 inch shall not exceed 10% of the circumference of the tank. The cumulative length of all primary seal gaps greater than 1/8 inch shall not exceed 30% of tank circumference. No continuous gap greater than 1/8 inch shall exceed 10% of the tank circumference.	Х	X
No gap in the secondary seal shall exceed 1/2 inch. The cumulative length of all gaps greater than 1/8 inch shall not exceed 5% of the tank circumference.	Х	x
If the primary seal is a metallic shoe, one end of the metallic shoe is to extend into the stored liquid and the other end is to extend a minimum vertical distance of 24 inches above the stored liquid surface. If the primary seal is a metallic-shoe-type seal, then the geometry of the shoe shall be such that the maximum gap between the shoe and the tank shell is no greater than double the gap allowed by the seal gap criteria for a length of at least 18 inches in the vertical plane above the liquid surface.	X	X
There shall be no holes or tears in, or openings in the envelope surroundings the annular vapor space enclosed by the roof edge, stored liquid surface, shoe, and seal fabric.	X	Х
The secondary seal shall allow easy insertion of probes up to one and one-half (2-1/2) inches in width in order to measure gaps in the primary seal.	Х	х
Secondary seal shall extend from the roof of the tank to the shell and not be attached to the primary seal.	Х	Х
Resilient toroid type seal;		
No gap between the tank and primary seal shall not exceed 1/2 inches. The cumulative length of all gaps greater than1/8 inch shall not exceed 30% of the circumference of the tank. No continuous gap greater than 1/8 inch shall exceed 10% of the tank circumference	X	Х

No gap in the secondary seal shall exceed 1/2 inch. The cumulative length of all gaps greater than 1/8 inch shall not exceed 5% of the tank	X	Х

circumference.		
There shall be no holes or tears in, or openings in the envelope surroundings the annular vapor space enclosed by the roof edge, stored liquid surface, shoe, and seal fabric.	X	Х
The secondary seal shall allow easy insertion of probes up to one and one-half (1/2) inches in width in order to measure gaps in the primary seal.	Χ	Х
Secondary seal shall extend from the roof of the tank to the shell and not be attached to the primary seal.	X	X
The primary seal envelope shall be made available for unobstructed inspection by the APCO on an annual basis at locations selected along its circumference at random by the APCO. In the case of riveted tanks with toroid-type seals, a minimum of 8 locations shall be made available; in other cases a minimum of 4 locations shall be made available. If the APCO suspects a violation may exist the APCO may be necessary to determine the seal condition for its entire circumference.	X	X
All openings in the roof used for sampling and gauging, except pressure-vacuum valves which shall be set to within 10 percent of the maximum allowable working pressure of the roof, shall provide a projection below the liquid surface to prevent belching of liquid and to prevent entrained or formed organic vapor from escaping from the liquid contents of the tank and shall be equipped with a cover, seal, or lid. The cover, seal, or lid shall at all times be in a closed position, with no visible gaps and be gas-tight, except when the device or appurtenance is in use. Gastight shall be defined as emitting no more than 10,000 ppm of methane measured at a distance of one centimeter from the potential source in accordance with EPA Method 21. Emissions from gauging or sampling device covers in excess of this limit shall be considered a leak.	X	X
Each roof drain shall be provided with a slotted membrane fabric cover that covers at least 90 percent of the area of the opening.	Χ	X
Fixed roof tanks with internal floating roof Liquid stored has a TVP of 11 psia or greater under storage conditions	X	X
No person shall place, store or hold in any floating roof tank of 19,800 gallons or greater, any organic liquid, light crude oil or petroleum distillate unless the internal floating roof is equipped with; 1) a floating roof consisting o a pontoon-type or double-deck-type cover, 2) a closure device between the tank shell and roof edge consisting of two seals.	Х	X
Fixed roof tanks with vapor recovery system  No person shall place, store or hold in any floating roof tank of 19,800 gallons or greater, any organic liquid, light crude oil or petroleum distillate unless the tank is equipped with a vapor loss prevention system, consisting of a system capable of collecting all VOC's, and a system for processing and for return to the storage or disposal of VOC's, so as to prevent their emission to the atmosphere at an efficiency of at least 95% by weight.	X	Х
Any tank gauging or sampling device an a tank vented to the vapor recovery shall have gas-tight covers and closed at all times except during gauging or sampling.	Х	X
All piping, valves and fittings shall be in a gas-tight conditions.	Χ	X
Storage in any above-ground tank of 19,800 gallons or less of gasoline unless		

tank is equipped with a pressure relief device set to within 10% of the maximum allowable working pressure of the container or is equipped with a vapor loss control device which complies with the requirements of the above rules.  TEST METHODS	X	Х
True vapor pressure shall be measured using Reid vapor pressure ASTM Method D323-82 modified by maintaining the hot water bath at storage temperature. Where storage temperature is above 100°F true vapor pressure shall be determined by Reid vapor pressure at 100°F and ARB approved calculations.	Х	Х
True vapor pressure of crude oil with an API (American Petroleum Institute) gravity less than 30°, as determined by API 2547, may be determined by Headspace Gas Chromatography using the procedures from ARB Evaluation of a Method for Determining Vapor Pressures of Petroleum Mixtures by Headspace Gas Chromatography, October 1990.	Х	X
Control efficiency shall be determined by a comparison of controlled emissions to those emissions which would occur from a fixed or cone roof tank in the same product service without a vapor recovery system. Emissions shall be determined based on tank emission factors in EPA Publication AP-42, component counts for fugitive emissions sources, recognized emission factors for fugitive emission sources and the efficiency of any VOC destruction device.	х	X
The efficiency of any VOC destruction device shall be measured by EPA Method 25, 25a, or 25b, and analysis of halogenated exempt compounds shall be analyzed by ARB Method 422.	X	X
RECORDKEEPING		
Keep an accurate record of liquids stored in each container, storage temperature of the Reid vapor pressure of such liquids.	Х	Х
Emergency standby tanks are exempt from the requirements of the requirements of the rule for floating roof tanks. Records shall be maintained as required by the rule and the date(s) liquid is first introduced to each tank and date(s) tank is fully drained. Such records shall be submitted to the APCO 60 days prior to permit renewal.	х	X
for tanks exempt to this rule the owner shall maintain monthly records of average daily throughout and shall submit such information to the APCO 30 day prior to annual permit renewal.	Х	Х

## APPENDIX C

## TEMPLATE QUALIFICATION FORM FOR TEMPLATE # SJV-TK-14-0

## **Title V General Permit Template Qualification Form**

District Pe	rmit #			
Please ans	swer the	questions in the table below. A fixed roof tank (unit) which meets the criteria of		
	•	d to use this template as part of a Title V application. To use this template,		
remove thi	remove this sheet and attach to application.			
Yes	No	Description of Qualifying Units		
		Is this unit equipped with an external floating roof and used for the storage of petroleum liquids? [40CFR60.112(a)] If "yes", continue to next question; otherwise STOP - you cannot use this template.		
		Is this storage vessel used for petroleum or condensate stored, processed and/or treated at a drilling and production facility prior to custody transfer? [40CFR60.110(b)] If "no", continue to next question; otherwise STOP - you cannot use this template.		
		Does this unit have a storage capacity greater than 40,000 gallons? [40CFR60.110(a)] If "yes", continue to next question; otherwise STOP - you cannot use this template		
		Does this unit store organic materials which are liquid at standard conditions and which are used as dissolvers, viscosity reducers, or cleaning agents? [District Rule 4661, 4.1] If "no", continue to next question; otherwise STOP - you cannot use this template.		
		Does this unit have a storage capacity greater than 40,000 gallons but not exceeding 65,000 gallons and commenced construction, modification, or reconstruction between March 8, 1974 and May 19, 1978, or have a storage capacity greater than 65,000 gallons and commenced construction, modification, or reconstruction between June 11, 1973 and May 19, 1978? [40CFR60.110(c)(1)] If "yes", continue to next question; otherwise STOP - you cannot use this template		
		Is the true vapor pressure of the petroleum liquid as stored greater than 1.5 psia and less than 11.1 psia? [40CFR60.112(a)(1)] If "yes", continue to next question; otherwise STOP - you cannot use this template.		
		Is this unit located at a heavy oil test station in Kern County? [District Rule 4404] If "no", continue to next question; otherwise STOP - you cannot use this template.		
		Is the unit exempt from Sections 5.1, 5.2, and 5.3 of District Rule 4623? If "no" you cannot use this template; otherwise you qualify to use this template.		
		and belief formed after reasonable inquiry 1) the information on this form is true, ste and 2) the facility is in compliance with this template's permit conditions:		
		nsible Official Date		
Name of R	Responsib	ole Official (Please Print)		